



ZACHARY W. CARTER
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

ARIEL S. LICHTERMAN
Assistant Corporation Counsel
Phone: (212) 356-3520
Fax: (212) 356-3509
alichter@law.nyc.gov

January 3, 2016

BY ECF

Honorable Edgardo Ramos
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Luis Vazquez v. City of New York, et al.
15-CV-8270 (ER)

Your Honor:

I am an Assistant Corporation Counsel in the Office of Zachary W. Carter, Corporation Counsel of the City of New York, and the attorney assigned to represent the Defendants in the above-referenced matter. Defendants write respectfully to request a three (3) day extension until January 6, 2016 to produce electronic discovery. Plaintiff's attorneys, Baree Fett and Gabriel Harvis, take no position on this request.

Your Honor granted Defendants an extension of time until today, January 3, 2016 to produce electronic discovery. To date, all email communications for the agreed-upon custodians have been pulled and compiled into a document review database, the agreed-upon search terms have been applied, and all documents have been reviewed for relevance and privilege. However, the documents are currently undergoing the quality control process, as well as being prepared for export and production, which is taking longer than anticipated. An additional three (3) days will enable the Defendants to complete this process and produce the relevant non-privileged documents to Plaintiff.

Accordingly, Defendants request an extension of time until January 6, 2016 to produce any electronic documents. Thank you for your consideration of this request.

Respectfully submitted,

/s/

Ariel Licherman
Assistant Corporation Counsel

cc: Baree Fett, Esq. (by ECF)
Gabriel Harvis, Esq.